

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

NELSON ONARO, D.O.,

DEFENDANT.

**CR20-089-RAW
JUDGE WHITE**

**DEFENDANT’S REPLY TO PLAINTIFF’S RESPONSE TO HIS MOTION TO WITHDRAW HIS PLEA OF
GUILTY**

COMES NOW, Defendant, by and through his counsel of record, hereby replies to Plaintiff’s Response Briefing as:

1. The parties have conferred and the United States has agreed to allow Defendant to withdraw Counts 1–5 of the original plea deal.
2. The parties have further conferred and Defendant agrees to maintain his plea to count 6 of the original plea.
3. However, considering five (5) out of (6) the counts will be, subject to the court’s approval, removed from the plea agreement, the parties need to structure a new and/or modify plea agreement. The new sentencing guidelines that accompany the single count are substantially different than the original plea agreement.
4. Upon completion of said new plea agreement and guidelines, parties request this court set a sentencing date at its discretion.
5. The United States is in agreement with this request and it is creating a superseding information with count six (6) only.

WHEREFORE, Defendant prays this court allow him to withdraw counts one through five of the original plea deal, allow the parties to structure a new plea agreement based on the sole one count, and set a sentencing date at the court's discretion.

s/ Zachary Enlow

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